REMARKS

In the Office Action, the Examiner rejected claims 1-21 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2005/0065951 of Liston et al. ("Liston") in view of U.S. Patent No. 6,360,223 to Ng et al. ("Ng") and further in view of the printed publication, "A Framework for Mapping Traceability Relationships," by Susanne A. Sherba et al. ("Sherba").

By this Reply, Applicants have amended claims 1, 15, and 18. Claims 1-21 are currently pending, with claims 1, 15, 18, and 21 being independent. Based on the foregoing amendments and the following remarks, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection.

I.   Rejection of Claims 1-21 under 35 U.S.C. § 103(a)

Applicants respectfully traverse the § 103(a) rejection of claims 1-21 under 35 U.S.C. § 103(a) as being unpatentable over Liston in view of Ng and further in view of Sherba. A *prima facie* case of obviousness has not been established with respect to claim 1-21.

"The key to supporting any rejection under 35 U.S.C. § 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. . . . [R]ejections on obviousness cannot be sustained with mere conclusory statements." M.P.E.P. § 2142, 8th Ed., Rev. 6 (Sept. 2007) (internal citation and inner quotation omitted). "The mere fact that references can be combined or modified does not render the resultant combination obvious unless the results would have been predictable to one of ordinary skill in the art." M.P.E.P. § 2143.01(III) (emphasis in

original). "All words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. § 2143.03. "In determining the differences between the prior art and the claims, the question under 35 U.S.C. § 103 is not whether the differences <u>themselves</u> would have been obvious, but whether the claimed invention <u>as a whole</u> would have been obvious." M.P.E.P. § 2141.02(I) (emphases in original).

"[T]he framework for objective analysis for determining obviousness under 35 U.S.C. § 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 U.S.P.Q. 459 (1966). . . . The factual inquiries . . . [include determining the scope and content of the prior art and] . . . [a]scertaining the differences between the claimed invention and the prior art." M.P.E.P. § 2141(II). "Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art." M.P.E.P. § 2141(III).

Amended independent claim 1 recites, among other things, "deriv[ing] one or more data dependency relationships from the data mappings, each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, one data dependency relationship being derived whenever there is at least one data mapping between the first controller and the second controller and between the second controller and the model; and visualiz[ing] the data dependency relationships directed from the first controller to the second controller and from the second controller to the model by displaying a link for each of one or more data dependency relationships, each link showing a direction of data dependency." <u>Liston</u>,

Ng, and Sherba, taken alone or in combination, fail to teach or suggest at least the recited elements.

The Examiner correctly observed that neither Liston nor Ng teaches or suggests "each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, one data dependency relationship being derived whenever there is at least one data mapping between the first controller and the second controller and the second controller and between the second controller and the model." Office Action at 4. The Examiner, however, attempted to cure these deficiencies of Liston and Ng by relying on Sherba. However, Sherba does not teach or suggest any "data dependency relationship being directed **from a first controller to a second controller . . . ,**" as recited in amended independent claim 1 (emphasis added). Instead, Sherba provides a framework for mapping traceability relationships, and teaches allowing new relationships to be discovered based on existing explicit relationships. Sherba, Section 1, paragraph 5. As shown in FIGs. 2-5, Sherba discloses explicit or implicit relationships from Requirements Specification to UML Class Diagram, from UML Class Diagram to Source Code, from Source Code to Mailing List Archive, and from Requirements Specification to Mailing List Archive. However, nowhere does Sherba teach or suggest any relationship being directed from a controller to another controller. See, for example, application, FIG. 10. Thus, Sherba does not teach or suggest "each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, . . . ,"

as recited in amended independent claim 1, and does not cure the deficiencies of Liston
and Ng.

Moreover, as the Examiner correctly observed, Liston does not teach
"visualiz[ing] the data dependency relationships [directed from the first controller to the
second controller and from the second controller to the model] by displaying a link for
each of one or more data dependency relationships, each link showing a direction of
data dependency." Office Action at 3. The Examiner attempted to cure these
deficiencies of Liston by relying on Ng. Id. However, as shown in FIGs. 5A, 5B, 5C,
and 6, Ng discloses inheritance relationships from a first database table to a second
database table or one data model corresponding to the first database table to another
data model corresponding to the second database, and mapping data between a
relational model and an object model. Ng, Abstract and Figs. 5A, 5B, 5C, and 6.
Nowhere does Ng teach or suggest "data dependency relationships directed from [a]
controller to [another] controller . . ," and therefore Ng fails to teach or suggest
"visualiz[ing] the data dependency relationships directed from the first controller to the
second controller and from the second controller to the model by displaying a link for
each of one or more data dependency relationships, each link showing a direction of
data dependency," as recited in amended independent claim 1.

In view of the mischaracterization of the Ng and Sherba references, above, the
Examiner has neither properly determined the scope and content of the prior art nor
properly ascertained the differences between the prior art and the invention of claim 1.
Moreover, there is no motivation for one of ordinary skill in the art to modify the

teachings of the references to achieve the claimed combinations. Thus, the Examiner

has failed to clearly articulate a reason why claim 1 would have been obvious to one of

ordinary skill in the art in view of the prior art. Accordingly, a *prima facie* case of

obviousness has not been established with respect to claims 1 and the rejection under

35 U.S.C. § 103(a) must be withdrawn.

Independent claims 15, 18, and 21, although of different scope, recite features

that are similar to the features recited in amended independent claim 1. For reasons at

least similar to the reasons set forth above with respect to amended independent

claim 1, a *prima facie* case of obviousness has not been established with respect to

independent claims 15, 18, and 21. Accordingly, Applicants respectfully request

reconsideration and withdrawal of the § 103(a) rejection of claims 15, 18, and 21 based

on Liston, Ng, and Sherba.

Dependent claims 2-14, 16, 17, 19, and 20 are allowable at least by virtue of their

dependence from an allowable independent claim. Accordingly, Applicants respectfully

request reconsideration and withdrawal of the § 103(a) rejection of dependent claims

2-14, 16, 17, 19, and 20 based on Liston, Ng, and Sherba.

II.   Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully

request reconsideration of this application and the timely allowance of the pending

claims.

The preceding arguments are based on the arguments presented in the Office

Action, and therefore do not address patentable aspects of the invention that were not

addressed by the Examiner in the Office Action. The pending claims may include other

elements that are not shown, taught, or suggested by the cited art. Accordingly, the

preceding arguments in favor of patentability are advanced without prejudice to other

bases of patentability. Furthermore, the Office Action contains a number of statements

reflecting characterizations of the related art and the claims. Regardless of whether any

such statement is identified herein, Applicants decline to automatically subscribe to any

statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge

any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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Dated: February 15, 2008   By: _____
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